

AT&T's Response
to BellSouth's April 15, 1997
Monthly Surveillance Report for Electronic Interfaces

This document provides AT&T's response to BellSouth's electronic interface report on a report category basis. The purpose of this document is to provide the Georgia Public Service Commission (the Commission) information which AT&T believes will clarify and amplify the Commission's understanding of facts and issues relating to the provision of electronic interfaces by BellSouth to AT&T.

AT&T intends to file responses to BellSouth's reports on a monthly basis.

Introduction (Page 3 of BellSouth Report)

BellSouth States:

"Because the interfaces BellSouth has implemented to date or expects to be available by April 30, 1997 provide nondiscriminatory access to BellSouth's systems, BellSouth disagrees with AT&T's suggestion that these interfaces are "interim" in nature."

AT&T Response:

AT&T takes issue with this statement for two reasons:

1. The Georgia Public Service Commission, not AT&T, determined the interfaces provided by BellSouth as a result of orders in Docket 6352-U to be interim:
 - The Commission's initial order in Docket 6801-U (page 23) states that "the Commission finds that the interfaces developed to date comply with the Commission's previous Orders and therefore are found to be sufficient to meet AT&T's interim requirements".
 - Also, in its Supplemental Order in Docket 6801-U (page 7), the Commission stated, "Docket 6352-U provided deadlines primarily for interim electronic interfaces; for permanent interfaces, the Commission generally directed the Parties to continue to work with the industry Ordering and Billing Form ("OBF)". Further in the Supplemental Order, the Commission also found it "appropriate to apply to the AT&T-BellSouth interconnection agreement in Georgia the same terms and conditions, including the deadline of December 31, 1997 for permanent interfaces, contained within the referenced BellSouth best and final offer in Tennessee and adopted by the Tennessee Regulatory Authority."
 - Further, in its Order in Docket 7253-U (page 28), the Commission stated "In addition, the pre-ordering and ordering interim "web" interfaces, and the interfaces for maintenance and repair, are not projected to be fully operational for roughly two months".

The Commission has never found that BellSouth's "interim" interfaces satisfied the requirements of the Act and its implementing regulations. In Docket 6801-U, the Commission found that "the interfaces developed to date comply with the Commission's previous Orders' and therefore are found to be sufficient to meet AT&T's interim requirements". The Commission never suggested that BellSouth's interfaces were adequate permanent interfaces. To the contrary, the Commission found "that AT&T's request [for permanent interfaces] is completely consistent with the FCC regulations,

¹ These previous orders referred to by the Commission applied only to resold services and did not address electronic interfaces for ordering unbundled elements, which are required by the Act and the FCC. The Commission's previous orders were issued in June and July of 1996, in advance of the issuance of the FCC regulations for operational interfaces.

which provide that incumbent LECs must provide non-discriminatory access to their operations support systems." Indeed, if the Commission had found the interfaces being developed by BellSouth as a result of Docket 6352-U to meet the requirements of the Act and the implementing regulations, it would have had no reason to find AT&T's request (for different interfaces) consistent with FCC regulations and it would not have ordered that the interfaces requested by AT&T be provided.

It is also important to note that the interconnection agreement between AT&T and BellSouth, which the Commission approved as being consistent with Sections 251 and 252 of the Act, requires not only that interim operational interfaces be provided, it also requires that permanent operational interfaces be provided by BellSouth. AT&T believes, if properly implemented, these permanent operational interfaces, and only these permanent operational interfaces, will be non-discriminatory as required by the Act and the FCC.

2. The interfaces BellSouth has implemented to date do not provide nondiscriminatory access to BellSouth's systems.

BellSouth has provided no real evidence to this Commission to support its claim that its interfaces provide non-discriminatory access to BellSouth's Operational Support Systems (OSS). The Commission's Order in Docket 7253-U made that perfectly clear. Indeed, the Commission found in its summary of major findings and conclusions in its Order in that docket (page 10) that, "For unbundled access to network elements and for resale, BellSouth has not yet demonstrated that it is able to provide access to operational support systems ("OSS") on a nondiscriminatory basis that places CLECS at parity with BellSouth." Underscoring the importance of this need for evidence of nondiscriminatory access, the Commission further stated in its Order (page 29) "However, internal testing has not yet begun for some of the interfaces; and it is not yet known what standards for reliability BellSouth used for its internal testing, although comparative standards must be evaluated to ensure that the interfaces provide non-discriminatory access."

Following are some illustrative key deficiencies in BellSouth's current operational support systems:

- As several State Commissions have found, web-based interfaces do not meet the requirements of Section 251 or its implementing regulations. For example, the South Dakota Public Utilities Commission found that the web-based interface is a "human interface," provides "inferior" service, and "does not comply with the federal Act or the FCC First Report and Order." South Dakota Public Utilities Commission, Findings of Fact and Conclusions of Law Order, Docket No. TC96-184, at 25 (Mar. 20, 1997). Similarly, the North Dakota Public Service Commission found that "the web-based interface does not meet the requirements of the FCC's First Report." North Dakota Public Service Commission, Arbitrator's Decision, Case No. PU-453-96-497, at 57 (Mar. 19, 1997). Likewise, the Montana Public Service Commission found merit in each of AT&T's criticisms regarding the deficiencies in the web-based

interface. Montana Public Service Commission, Arbitration Decision and Order (No. 5961b), Docket No. D96.11.200, at 56 (Mar. 20, 1997). These deficiencies included: (i) that "the web page solution is a human interface and is prone to error;" and (ii) "the web page solution provides service inferior to that which U.S. West provides itself." Id. at 55.

- Based on AT&T's experience in attempting to order unbundled network elements, access to operational support systems, as well as basic methods and procedures for ordering unbundled network elements are completely inadequate and discriminatory. Processes for the exchange of usage data to bill other carriers do not exist.
- Both Local Exchange Navigation System (LENS) and Trouble Analysis Facilitation Interface (TAFI) are proprietary systems, which allows BellSouth to make unilateral changes to its systems. Once such changes are made, users must change their own systems to remain compatible, or if they are operating in a human to machine mode, retrain their employees at the whim of BellSouth's decision to make changes. BellSouth has provided no change management process for these interfaces by which users can incorporate such changes into their operations. To the contrary, the rate of unilateral and uncoordinated changes to LENS is accelerating. BellSouth advised AT&T on May 5 that changes to LENS would occur frequently (it was currently producing two releases a week to correct existing errors at the time of the May 5 demonstration to AT&T) and would continue at least monthly until the end of the year. BellSouth also advised AT&T that the old releases of LENS would not be available for use once the new releases were in production. The current and planned instability of the LENS design by BellSouth renders the specifications provided to AT&T on April 25 unusable, and furthermore it is not feasible for AT&T to attempt to build a machine-to-machine interface in such an extremely unstable environment. (See more about AT&T's efforts to receive LENS information in a machine-to-machine format on pages 8-10 of this report)
- BellSouth's LENS interface is discriminatory because it requires human intervention, and does not provide the same capabilities to new entrants that BellSouth's operational support systems provide to itself. Some examples of dissimilar capability include:
 - Other than order due date, it is not possible to make changes to pending orders.
 - Access to Customer Service Records are not available in LENS.
 - Access to telephone number availability is limited.
 - Due dates are manually calculated based on standard intervals in an inquiry mode.

- Access to valid street address information is not provided in an inquiry mode.**
- Zip code information is not available.**
- UNE information transmitted through LENS must be included in the Remarks section of the order, which means it must be handled manually by BellSouth.**

In addition to the some of the discriminatory characteristics of LENS noted on the previous page, following are additional deficiencies in LENS' general availability that AT&T was made aware of during a demonstration of LENS on May 5 provided by BellSouth to AT&T.

- No LENS User's Guide is available to train employees or establish methods and procedures.**
- IDs are required to use the system, but BellSouth will not have an ID administration group in service until June 1. The existing ad hoc method of obtaining IDs for access to other data bases through the Account Team has proven to be inefficient and very slow.**
- Other than the order due date, it is not possible to make changes to pending orders.**
- No data was available on the quality of the access and whether LENS will provide parity. Of equal importance, BellSouth has provided no data as to the performance of its own operational support systems. This renders it impossible to compare the access provided by LENS with the access BellSouth provides itself to its operations support systems to determine whether the performance of LENS is non-discriminatory. According to BellSouth, it is looking at a method to track and document response time for LENS.**
- There was no compatibility check for features selected. A new entrant could select features to go on a telephone line that would not work with that line.**
- Glitches occurred, such as; the ESSX Features file would not open, and an attempt to search for sequential numbers timed out and could not be performed.**

Introduction (Page 3 of BellSouth Report)

BellSouth States:

"BellSouth is willing to work with AT&T to include information about the development of the interfaces requested by AT&T in future monthly surveillance reports."

AT&T Response:

The Order in Docket 6801-U at page 23 states that "The Commission rules that AT&T and BellSouth shall continue to comply with the Commission's orders in Docket 6352-U, including the requirement to file monthly surveillance reports to update the Commission on the development and implementation of these electronic interfaces". AT&T approached BellSouth regarding the filing of joint reports to keep the Commission apprised of the status of implementation of the permanent interfaces required by the AT&T/BellSouth interconnection agreement as required by the Commission in its Order. BellSouth subsequently offered the following procedure, which AT&T accepted:

- BellSouth will prepare the initial draft of the joint report to be filed by the 15th of each month reporting the results of the prior month.**
- BellSouth will provide a copy of the draft to AT&T by the 5th of each month for review and comment.**
- The first report to include the status of the permanent interfaces will be filed July 15.**

Details on matters such as report format, reporting of differences in views between the two companies, etc. have not yet been completed.

Joint Implementation Team

No comments.

Pre-Ordering Phase 1 - LAN-to-LAN Access

No comments.

Pre-Ordering Phase 1 - Transferring Files via Diskette

No comments.

Pre-Ordering Phase 1 - Transferring Files Electronically

No comments.

Phase II Interactive Pre-ordering and Interactive Direct Entry Ordering

BellSouth States:

"AT&T's response to BellSouth's March 28, 1997 Monthly Surveillance Report describes the development of a third interface, Common Gateway Interface (CGI). This interface will exist as an alternative for those CLECS who want to develop their own presentation systems for use with BellSouth's data and was described in BellSouth's testimony described in the AT&T arbitration proceeding. BellSouth proposed this alternative in September, 1996 and has been working with AT&T on this alternative since it received AT&T's request for data in January, 1997. However, because the CGI alternative builds upon the LENS interface, firm specifications for the CGI interface cannot be provided until the LENS interface is finalized."

AT&T Response:

BellSouth appears to indicate that AT&T and BellSouth began working on this issue in January, 1997. Following is an accurate representation of the timeline and activities surrounding this issue:

- AT&T and BellSouth first discussed BellSouth's Web Proposal on August 23, 1996. During that meeting, AT&T expressed its desire and need for a machine-to-machine interface rather than a Web-based interface.
- In response to AT&T's request, BellSouth prepared a "White Paper" on September 6, 1996. BellSouth subsequently presented its "White Paper" to this Commission as an option it was willing to provide. This White Paper described two alternative "data stream", "Tag Value" methods of providing the relevant queries and database responses that BellSouth could generate from its Web or CGI Server instead of Web Pages.
- In the following months, AT&T repeatedly requested additional specifications from BellSouth regarding both the Web Page and Tag Value options. None were provided.
- In the Georgia Arbitration Hearings (Docket 6801-U) in November, 1996, BellSouth's witness Gloria Calhoun stated that "what we offered to do was send them (AT&T) just a data stream, unformatted, unrepresented". Despite this testimony, however, and despite AT&T's specific and repeated requests for a machine-to-machine interface and the requests for specifications for other interfaces BellSouth was developing, Ms. Calhoun also stated "that's not something that I think they've taken us up on yet." (See attachment 1-Transcript of Gloria Calhoun in Docket 6801-U) Shortly thereafter, AT&T attempted to continue its dialogue on this subject with BellSouth, only to be told that it would be December or January before BellSouth could meet with AT&T. BellSouth did confirm that the Tag Value method was still available.

- A meeting was finally held on January 23, 1997. During this meeting BellSouth stated that its focus, resources and priority were dedicated to the implementation of the Web Page interface scheduled for release on March 31, 1997. BellSouth also stated that it felt it could implement the "Post" Tag Value method described in the White Paper 30 days after the Web Page interface was implemented. Both parties felt May 1, 1997 would be an obtainable target date for this to occur. AT&T renewed its long standing request for specifications on both the Web Page and Tag Value proposals. BellSouth subsequently provided a document, which upon review by AT&T was determined to be only a slightly enhanced "use case" similar to that contained in the original August 15, 1996, report to the Commission. It provided little information of value to AT&T for use in the development or design of software that would be needed by AT&T.
- The information AT&T needed was not made available until March 20, 1997, and only then following escalation to the executive level in BellSouth. This delay in providing specifications resulted in AT&T's determination that July 1, 1997 was the earliest possible implementation date for AT&T to make use of the Tag Value data stream, given the development and testing required by both parties.
- During the BellSouth CLEC Training Seminar held on April 1, 2 and April 3, 1997, BellSouth presented both the September 6, 1996, and March 20, 1997, documents to the CLEC industry. These documents were represented as an available machine-to-machine alternative to its LENS web pages interface.
- On April 8, 1997 (5 days later), BellSouth reported during the weekly Joint AT&T/BellSouth Implementation Team call that BellSouth had discovered that the Tag Value method described in the September 6 White Paper and the March 20 specifications was not feasible in general, and would definitely not be available for use by July 1, 1997.
- On conference calls held on April 14 and 15, BellSouth and AT&T discussed alternatives ranging from BellSouth delivering Tag Values as originally committed to the possibility of finding a commercial software program to perform the required conversion work. Both BellSouth and AT&T estimated the time to build such a converter to be approximately 2-3 months. No such commercial software was found.
- On April 25, BellSouth faxed to AT&T specifications describing its Web-page outputs, with which AT&T could build its own conversion programs for machine-to-machine operation.
- On May 5, 1997, BellSouth, in a LENS demonstration for AT&T, stated that it had changed the Web page screens as recently as Sunday, May 4. BellSouth further stated that it would continue to change LENS on no less than a monthly basis for

the remainder of the year, and that it was currently producing two releases a week to correct existing errors. BellSouth also advised AT&T that the old releases of LENS would not be available for use once the new releases were in production. The net result of these actions by BellSouth is that the specifications provided to AT&T on April 25 are no longer usable, and it is not feasible for AT&T to attempt to build a machine-to-machine conversion process in such an extremely unstable environment. Indeed, this lack of feasibility is confirmed by the BellSouth through the following information about its views on the need for firm specifications and time for implementation:

- —Its statement from the top of page 8 of this report that "because the CGI alternative builds upon the LENS interface, firm specifications for the CGI interface cannot be provided until the LENS interface is finalized."
- —The requirements BellSouth has placed on AT&T during the planning and negotiations of the permanent interfaces, in which BellSouth continually maintains that any changes in specifications provided by AT&T most likely would result in delays in implementation by BellSouth.
- —The following language from Paragraph 5.1.6-Attachment 15 of the AT&T/BellSouth Georgia interconnection agreement, which demonstrates an orderly, planned, cooperative approach to changes to interfaces. "AT&T and BellSouth agree to adapt the interface based on evolving standards...The Parties agree to use best efforts to implement such changes, including testing of changes introduced, within 7 months of the publication date of guidelines. This preceding target implementation obligation may be modified by mutual agreement."

Thus, not only did BellSouth renege on its commitments to AT&T, which were made to AT&T in numerous meetings and also to this Commission by Gloria Calhoun, it also created an environment which prevents AT&T from using LENS in anything but a human-to-machine environment through at least the remainder of the year. BellSouth's proposed interfaces will thus remain discriminatory through the end of the year.

Ordering - Electronic Data Interchange

BellSouth States:

"AT&T Comments on BellSouth's March 28, 1997 monthly surveillance report suggest that BellSouth's EDI implementation did not include all tariffed services. However, this has never been a requirement. In its June 12, 1996 order in Docket 6352, the Commission found that "...it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting and informational databases for their customers as does BellSouth" (emphasis added). BellSouth efforts relating to EDI have been based on this objective. BellSouth does not create orders for all services for its retail customers on a totally mechanized basis, nor are such orders always created on the initial contact with a customer. Many services, particularly complex services such as the MultiServ example raised by AT&T, require account team intervention which often results in manual order handling. Services requiring account team intervention, therefore, have not been mapped to EDI for CLEC customers."

AT&T Response:

BellSouth accurately quoted the Commission's initial Order in Docket 6352-U, which stated at page 10 that it is imperative that a reseller have access to the same service ordering provisions, service trouble reporting and informational databases for its customers as does BellSouth. BellSouth further states that its efforts relating to EDI have been based on this objective. However, it failed to quote the Commission's second Order in Docket 6352-U, which states on page 4, "BellSouth is to make fully operational and available by December 15, 1996 the Electronic Data Interface capability for receipt and transmission of orders for services in BellSouth's General Subscriber Services and Private Line Tariffs." BellSouth's statement that inclusion of all tariffed services "has never been a requirement" contradicts the Commission's Order.

In any event, BellSouth does not provide new entrants with nondiscriminatory access where BellSouth's order handling is not fully automated. For example, BellSouth accesses various databases when processing a complex service order and at some point enters that complex order into its systems. To be nondiscriminatory, BellSouth must provide new entrants with access to those various databases, and with the capability to enter the complex order directly into BellSouth's system, just as BellSouth does.

Trouble Report Entry

No comments.

Daily Usage Data

No comments.

Customer Records - Mechanized Access

BellSouth States:

In its Milestones Accomplished:

Requirements developed

4/18/97

In its Milestones Ahead:

Work plan for implementation developed; dates for design completion, implementation, and testing determined

4/22/97

AT&T Response:

In its April 15th surveillance report, BellSouth stated that it had completed the development of Customer Service Records (CSRs) requirements by April 18th and would develop the workplan by April 22nd. When asked at a meeting between AT&T and BellSouth on April 22nd, BellSouth stated that it did not have any additional written details or requirements for CSRs other than the four pages of view graphs BellSouth had provided previously. On May 1st, AT&T again asked BellSouth for the CSR information, referencing BellSouth's April 15th Surveillance report. Finally on May 7th, BellSouth provided additional information, which AT&T is currently reviewing.

1 manually re-enter it. And we suggested that there are ways
2 that they could not have to manually re-enter it, even if
3 they wanted to have it in their own separate ordering
4 database. There is software that can be used to read that
5 information that's sitting on your screen, to turn it into
6 data that can be read by the computer and that can be
7 manipulated then by the computer and integrated from program
8 to program.

9 AT&T was not happy with that solution and so what
10 we offered to do was, rather than present the information to
11 them on a screen -- that's called a presentation system or
12 the presentation software that was described in my direct
13 testimony -- what we offered to do was send them just a data
14 stream, unformatted, unrepresented. A way to think about that
15 is if you've ever -- before there was Windows, if you ever
16 looked at a file on a computer screen that just looked like
17 symbols and gibberish and -- it wasn't presented, it wasn't
18 in a presentation format, it was just computer language and
19 it wasn't something that could be read by a human. We said
20 we can send it to you that way, so that you can pick it up
21 and let your system manipulate it if you want to use it that
22 way. That was the purpose of the September 6 white paper.
23 But again, that's not something that I think they've taken
24 us up on yet.

25 So the real difference -- to kind of give you a

CERTIFICATE OF SERVICE

DOCKET NO. 5825-U

This is to certify that I have served copies of the foregoing AT&T's Response to BellSouth's April 15, 1997 Monthly Surveillance Report for Electronic Interfaces upon all parties of record by depositing same in the United States Mail, postage prepaid, this fourteenth day of May, 1997:

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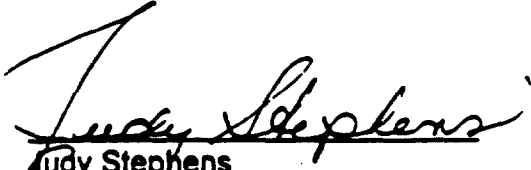
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Judy Stephens

ATTACHMENT 15

RECEIVED JUL 29 1997



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LIAM Vice President
Southern States

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404 810-4575
FAX: 404 810-4593

July 28, 1997

Mr. Quinton Sanders, Director
AT&T Regional Account Team
Suite 410
1960 West Exchange Place
Tucker, GA 30084

Dear Quinton:

Now that we have both returned from vacation, I am responding to your letter of June 18. In that letter, I thought you fell short of answering my questions regarding billing process improvement and, instead, attached a June 11, 1997, letter that offers to train AT&T to reduce order input errors and ensure that pre-ordering, ordering, provisioning, maintenance, and billing processes are clearly understood. In that letter you also seemed to be comparing AT&T's local order entry performance (after only a few months of experience) to BellSouth's billing performance (given its decades of experience). Nevertheless, AT&T is always interested in improving customer service and will certainly avail itself of real opportunities to improve our customers' experience and to work with BellSouth to ensure that all processes are clearly understood by both companies.

The performance data you shared in the June 11 letter (which I first received as an attachment to the June 18 letter) regarding errors and primary targets for improvement are substantiated by our own data and provide a start toward understanding the problem and the joint plan for improvement. AT&T's analysis of the data indicates that the Address Validation errors are largely attributable to input errors made by service representatives as they take customer information they view in BellSouth's IC Reference system and recreate it by manually re-typing it into the Local Service Request format. AT&T anticipated that this input error problem would be significant, and we attempted to develop an interface to LENS via "tagged data" to avoid this very situation. However, as you know, BellSouth was unable to develop the "tagged data" capability that we had agreed upon.

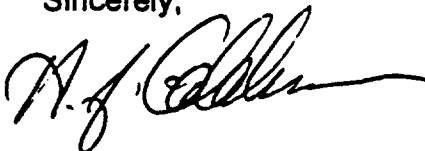
Since the opportunity for that development has passed, AT&T must manually transfer information from BellSouth's database to our own internal ordering interface. Even as AT&T migrates its users from IC-Reference to BellSouth's LENS application, data must still be manually transferred into AT&T's ordering system. Therefore, I am not sure that additional training on the use of BellSouth's validation system, either IC-Reference or BellSouth's LENS, would be especially helpful in reducing the types of errors that AT&T is experiencing because of the manual processes AT&T is relegated to use. These errors are largely the result of AT&T having to use the interim systems available today and having to manually link data in order to complete a service order.

In fact, AT&T feels that order entry errors would be eliminated only if BellSouth provided an interface at parity to the interface it uses for itself. BellSouth has the advantage of comparatively well designed ordering systems that allow the BellSouth agent to validate data and populate the BellSouth service order without manual re-entry of the pre-order information. Indeed, BellSouth's order entry system for itself practically eliminates BellSouth's risk of service order error by providing interactive editing prior to order submission. BellSouth has a great advantage over AT&T in that BellSouth has been able to eliminate re-work associated with order clarification that AT&T must perform.

Since parity interfaces are currently unavailable, the performance data that you provided with your June 18 letter simply validates the fact that manual interfaces such as IC-Reference will handicap new market entrants by substantially increasing the pre-order entry error rate. AT&T agrees with BellSouth's assessment that it will be difficult to achieve the levels of customer satisfaction AT&T desires in this manual environment.

We feel that continuous communication and sharing learnings are vital to monitor progress as we both strive to improve our performance. We also encourage BellSouth to improve its performance and provide parity electronic interfaces to AT&T as an urgent priority so that AT&T can efficiently meet the level of service that our customers demand and deserve.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Calabrese', with a stylized flourish at the end.

Al Calabrese

Attachment

cc: Pam Nelson

BellSouth Interconnection Services 770 492-7560
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1960 West Exchange Place
Tucker, Georgia 30084

Quinton E. Sanders
Senior Director -
AT&T Regional Account Team

June 18, 1997

Mr. A. J. Calabrese
LIAM Vice President
Southern States
AT&T
Room 10144
1200 Peachtree Street
Atlanta, Georgia 30309

Dear Al:

Thank you for your letter of June 17 addressing the Atlanta Journal and Constitution article concerning billing errors. Let me respond to your questions in that letter.

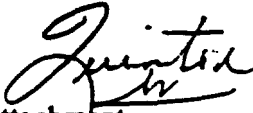
First, BellSouth is also concerned about errors on customers bills. We have many safeguards built into our mechanized systems to avoid errors. In addition, we often develop new procedures/processes to improve ordering and billing accuracy. We proactively audit our own ordering and billing procedures. . . and systems to detect human or machine errors. When we find a billing discrepancy we correct it right away in a "customer friendly" manner. In this regard, as the ESSX® article makes clear, our current policy is: "Where cases of overbilling are discovered, we will refund the overbilling - with interest, without any netting for past underbilling. On the other hand, we will not assess charges for past underbilling; we will simply adjust future billing appropriately". Also, I should point out that our error rate is very low compared to the number of bills and number of items we process. In any event, immediately upon resale of an ESSX System, BellSouth will verify the billing for that system.

Let me respond to your comment regarding BellSouth's compliance to its billing obligations under our Interconnection Agreement. Attachment 6 of the agreement relating to "testing procedures" and "bill accuracy certification" outlines the process to ensure quality billing. As you know, both our teams are currently working to implement this portion of the agreement and will continue to do so until we are jointly satisfied with the outcome.

Finally, as AT&T prepares to enter the local market, I'm sure you are developing an appreciation for how sophisticated ordering and billing systems must be. Thus, the people responsible for processing orders must be extremely knowledgeable. Judging from the high

error rate on the local orders you've sent us, so far, it is most probable that billing errors will occur. Let me suggest you take advantage of the offer in my letter of June 11, 1997 (attached) to provide support in this area.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mark Feidler".

Attachment

cc: Mark Feidler
Joe Baker
Terrie Hudson

ATTACHMENT 16

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
COLUMBIA, SOUTH CAROLINA**

HEARING #9633

JULY 7, 1997

11:00 A.M.

**DOCKET NO. 97(101(C: BELLSOUTH TELECOMMUNICATIONS, INC. - Entry
into InterLATA Toll Market [Section 271].**

HEARING BEFORE: Chairman Guy Butler, Presiding; Vice Chairman Philip T. Bradley; and Commissioners Rudolph Mitchell, Cecil A. Bowers, Warren D. Arthur, IV, William "Bill" Saunders, and C. Dukes Scott.

STAFF: Gary E. Walsh, Deputy Executive Director; D. Wayne Burdett, Manager, and James M. McDaniel, William O. Richardson, and David S. Lacoste, Utilities Department; R. Glenn Rhyne, Manager, and James E. Spearman, Research Department; F. David Butler, Esq., General Counsel; and MaryJane Cooper and Yvonne T. Grey, Hearing Reporters.

BELLSOUTH COMPANIES: Harry M. Lightsey III, Esq., William F. Austin, Esq., William Ellenburg, Esq., and Edward Rankin, Esq., representing BELLSOUTH TELECOMMUNICATIONS, INC.

Kevin A. Hall, Esq., and Dwight F. Drake, Esq.,
representing BELLSOUTH LONG DISTANCE, INC.

INTERVENORS: William R. Atkinson, Esq., Darra W. Cothran, Esq., and Carolyn C. Matthews, Esq., representing SPRINT COMMUNICATIONS COMPANY, L.P.

John M.S. Hoefer, Esq., and Marsha A. Ward, Esq., representing
MCI TELECOMMUNICATIONS, INC.

B. Craig Collins, Esq., and Mitchell M. Willoughby, Esq.,
representing SOUTH CAROLINA CABLE TELEVISION ASSOCIATION.

Herbert Buhl, Esq., representing COMMUNICATION WORKERS
OF AMERICA.

Francis P. Mood, Esq., Kenneth P. McNeely, Esq., Michael Hopkins, Esq., and Steve A. Matthews, Esq., representing AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.

Elliott F. Elam, Jr., Esq., representing CONSUMER ADVOCATE
FOR THE STATE OF SOUTH CAROLINA.

Russell B. Shetterly, Jr., Esq., representing ACSI (American
Communications Services, Inc.).

M. John Bowen, Jr., Esq., representing SOUTH CAROLINA
TELEPHONE COALITION.

Frank R. Ellerbe III, Esq., representing SOUTH CAROLINA
COMPETITIVE CARRIERS ASSOCIATION.

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1 dates are available in the pre-ordering phase via LENS, is
2 that correct?

3 A Yes, I did. Due dates are in kind of a gray area
4 between pre-ordering and ordering, and they are available
5 through LENS in both the pre-ordering mode and the ordering
6 mode. But, depending on which mode you're in, due dates can
7 be slightly different. So you can't always characterize
8 them as being strictly pre-ordering.

9 Q Well, then, you just contradicted yourself, didn't you?
10 either they are or they aren't available in the pre-ordering
11 phase?

12 A Due date information is available in the pre-ordering
13 phase, yes.

14 Q Isn't it true, Ms. Calhoun, that only the intervals are
15 available in the pre-ordering phase, and that the CLEC does
16 not have due date information available to it in the pre-
17 ordering phase?

18 A No, I don't think that's true.

19 Q Okay. Later on page 11, I think down around line 19,
20 you address the dual entry issue that competing LECs have.
21 And that's one of the issues that Competing LECs have given
22 to Commissioners about why LENS is not, I guess, sufficient
23 from a Competing LECs' perspective and is not in parity.
24 You mentioned that there are a couple of different options